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March 31, 2004

ATTORNEY DOCKET NO. 05997.0013-03000
CUSTOMER NO. 22,852



Mail Stop Patent Application
Commissioner for Patents
P.O. Box 1450
Alexandria, VA 22313-1450

New U.S. Patent Application
Title: RISK-BASED REFERENCE POOL CAPITAL REDUCING
SYSTEMS AND METHODS
Inventors: Paul A. Thomas et al.

Sir:

We enclose the following papers for filing in the United States Patent and Trademark Office in connection with the above patent application.

1. Application- 80 pages (including cover sheet), including 12 independent claims and 33 claims total.
2. Formal Drawings- 16 sheets of drawings (Figures 1-16).
3. Request for Non-Publication of Application and Certification Under 35 U.S.C. § 122(b)(2)(B)(i).
4. The filing fee is calculated as follows:

Basic Application Filing Fee					\$770	\$ 770.00
	Number of Claims		Basic	Extra Claims		
Total Claims	33	-	20	13	x \$18	234
Independent Claims	12	-	3	9	x \$86	774
<input type="checkbox"/> Presentation of Multiple Dep. Claim(s)					+\$290	0
Subtotal						\$ 1778
Reduction by 1/2 if small entity						- 0
TOTAL APPLICATION FILING FEE						\$ 1778

5. A check for \$770 is enclosed. The fee includes:
\$770 filing fee.

Please charge any additional fees due at this time to our Deposit Account No. 06-0916.

6. This application is a continuation-in-part (CIP) of Application Serial No. 10/096,584, filed March 14, 2002, which is a CIP of Application Serial No. 09/602,254, filed June 23, 2000. This application is being filed under the provisions of 37 C.F.R. § 1.53(b).
7. Applicants claim the right to priority based on Provisional Patent Application No. 60/151,071 filed August 27, 1999.

Please address all correspondence with respect to this application to:

Finnegan, Henderson, Farabow,
Garrett & Dunner, L.L.P.
1300 I Street, N.W.
Washington, D.C. 20005-3315

This application will be completed in accordance with 37 C.F.R. § 1.53(f) upon receiving a Notice to File Missing Parts of Application.

Please accord this application an application number and filing date.

Commissioner for Patents
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FINNEGAN
HENDERSON
FARABOW
GARRETT &
DUNNER LLP

The Commissioner is hereby authorized to charge any additional fees due and any other fees under 37 C.F.R. § 1.16 or § 1.17 during the pendency of this application to our Deposit Account No. 06-0916.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

By: William J. Brogan
William J. Brogan
Reg. No. 43,515

WJB/blf
Enclosures

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE

In re Application of:)
)
Paul A. Thomas et al.) Group Art Unit: Not Yet Assigned
)
Continuation-in-Part of) Examiner: Not Yet Assigned
Application No.: 10/096,584)
)
Filed: March 14, 2002)
)
For: RISK-BASED REFERENCE POOL)
CAPITAL REDUCING SYSTEMS)
AND METHODS)
Commissioner for Patents
Washington, DC 20231

Sir:

**REQUEST FOR NON-PUBLICATION OF APPLICATION AND
CERTIFICATION UNDER 35 U.S.C. § 122(b)(2)(B)(i)**

As an authorized agent of the above-identified applicant, the undersigned attorney hereby certifies that the invention disclosed in the attached application has not and will not be the subject of an application filed in another country, or under a multilateral agreement, that requires publication at eighteen months after filing. I hereby request that the attached application not be published under 35 U.S.C. § 122(b).

I further understand that this non-publication request may be rescinded at any time and if so, the application will be scheduled for publication at eighteen months from the earliest claimed filing date for which a benefit is claimed.

I further understand that if applicants subsequently file an application directed to the invention disclosed in the attached application in another country, or under a multilateral international agreement, that requires publication of applications eighteen

months after filing, the United States Patent and Trademark Office must be notified of such filing within forty-five (45) days after the date of the filing of such foreign or international application. I also understand that failure by applicants to so notify the Patent and Trademark Office will result in abandonment of this application.

Respectfully submitted,

FINNEGAN, HENDERSON, FARABOW,
GARRETT & DUNNER, L.L.P.

Dated: March 31, 2004

By: William J. Brogan
William J. Brogan
Reg. No. 43,515